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November 12, 2024

Honorable Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Application GRANTED. The Clerk of Court is directed to terminate the motion at Dkt. 89.

SO ORDERED.



Arun Subramanian, U.S.D.J.

Dated: November 14, 2024

VIA ECF & EMAIL

Re: United States v. Edward O'Donnell
23 Cr. 499 (AS)

Dear Judge Subramanian:

Defendant Edward O'Donnell ("O'Donnell") is scheduled to voluntarily surrender on January 10, 2025. Pending this voluntary surrender, O'Donnell is at liberty on a \$250,000 unsecured bond that contains numerous conditions including a restriction of his travel to the Southern and Eastern Districts of New York and the Eastern District of Pennsylvania. By this letter, O'Donnell respectfully makes two travel requests. First, from December 6, 2024 through December 8, 2023, O'Donnell would like to travel, with his family, to the Plymouth/Boston, Massachusetts area to visit his sister-in-law. Second, from December 29, 2024 through January 3, 2024, he and his family would like to travel to the Deerfield Beach, Florida area for a family vacation. O'Donnell will provide a specific itinerary to Pretrial Services ("Pretrial") well in advance of any travel. Pretrial, by United States Pretrial Officer Robert Stehle from the supervising district, consents to this application and has confirmed the consent of SDNY Pretrial Services. The government, by Assistant United States Attorney Thomas Burnett, also consents.

Thank you for Your Honor's consideration of these applications.

Very truly yours,

Sanford Talkin
Sanford Talkin

AUSA Thomas Burnett (by ECF)
USPTO Robert Stehle (by email)